

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RICHARD GAFFEY,
a/k/a "Dick Gaffey,"

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/24/2020

Protective Order

18 Cr. 693 (RMB)

IT IS HEREBY AGREED by and among the United States of America, by Geoffrey S. Berman, United States Attorney for the Southern District of New York, Eun Young Choi and Thane Rehn, Assistant United States Attorneys, of counsel, Deborah Connor, Chief of the Money Laundering and Asset Recovery Section for the Department of Justice, Michael Parker and Parker Tobin, Trial Attorneys, of counsel, and Richard Gaffey, the defendant, by his counsel William Lovett, Esq., and Robert Buehler, Esq., that, with respect to all materials produced under 18 U.S.C. § 3500 ("3500 Material") and other witness material marked Attorney's Eyes Only ("AEO Material"):

(1) defense counsel must destroy or return to the Government all 3500 Material and AEO Material (including all copies), at the conclusion of the trial of this matter or when any appeal has become final;

(2) Defense counsel may disclose 3500 Material (and any copies) to the defendant Richard Gaffey, any paralegal or staff employed by the defense, and any expert witness the defense intends to use at trial (collectively, "Designated Persons");

(3) To the extent any Designated Person (or any other party not provided for herein) obtains any 3500 Material that is the subject of this Order, such 3500 Material shall not be further disclosed in any form, including but not limited to orally disclosing such information

and posting such information on the Internet;

(4) Defendant Richard Gaffey and his counsel of record shall provide a copy of this Order to any Designated Persons to whom the 3500 Material is disclosed pursuant to paragraph 2. Prior to disclosure of such material to any Designated Person, pursuant to paragraph 2, any such Designated Person shall agree to be subject to the terms of this Order;

(5) AEO Material shall be prominently marked "Attorney's Eyes Only." AEO Material shall not be disclosed in any form, including but not limited to orally disclosing such information, to defendant Richard Gaffey or anyone else beyond defense counsel. If counsel for the defendant determines that the AEO Material is material and relevant to the investigation and defense of their client and requires counsel to share the information subject to this protective order with their client, counsel for the defendant reserve the right, on notice to the Government, to seek permission from the Court to do so.

IT IS SO ORDERED.

Dated: New York, New York
February 24 2020



HONORABLE RICHARD M. BERMAN
United States District Judge
Southern District of New York

GEOFFREY S. BERMAN
United States Attorney
Southern District of New York

DEBORAH CONNOR
Chief, Money Laundering and
Asset Recovery Section

By:



Eun Young Choi
Thane Rehn
Assistant United States Attorneys

Michael Parker
Parker Tobin
Trial Attorneys, Criminal Division



William Lovett, Esq.
Robert Buehler, Esq.
Attorneys for Defendant Richard Gaffey